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April 29, 2021

Via ECF

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York

**Re:** *Steven Nachshen v. 53-55 West 21ST Owner LLC and New Lounge 4324, LLC*  
**Docket No. 1:19-cv-01903 (RA)(KHP)**

Dear Judge Abrams:

We represented the now deceased plaintiff, Steven Nachshen, in the above entitled action. Pursuant to Your Honor's Order of February 2, 2021, we write to provide a status update to inform the Court that Louise Nachshen will become the administrator of plaintiff Steven Nachshen's estate. Louise Nachshen will be substituted on Steven Nachshen's behalf and she intends to continue the prosecution of this action.

Louise Nachshen has filed a Petition for Letters of Administration with the New York State Surrogate Court, County of New York. Counsel has been informed that the increase in the death toll caused by COVID-19 has significantly delayed the processing and disposition of Surrogate Court petitions in New York County. Since the death of plaintiff Steven Nachshen, counsel has worked diligently toward obtaining the appointment of an administrator for the estate and has had to tactfully work with plaintiff's grieving family to focus on this issue and make a decision as to who will be the administrator. This is difficult in normal times but made especially more difficult by the inability to communicate in person.

**Accordingly, we respectfully ask the Court to extend the stay of this action pending the appointment by the New York State Surrogate Court of Louise Nachshen as the representative of Mr. Nachshen's estate.** Counsel suggests that a status letter be filed by July 30, 2021 to inform the Court regarding the status of the appointment by the New York State Surrogate's Court.

Now the New York State Surrogate Court controls how much longer this process will take. Upon information and belief, New York State Surrogate Court has been overwhelmed by an increase in petitions caused by COVID-19. Counsel will endeavor to work with the New York State Surrogate's Court to the extent it requires any further information or filing.

Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/

Glen H. Parker, Esq.